

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CASE NO. 19-24472-CMB</b>
<b>David Fetsko and</b>	:	
<b>Miranda Fetsko,</b>	:	<b>CHAPTER 13</b>
<b>Debtors</b>	:	
	:	<b>RELATED TO DOCKET NO. 66</b>
<b>USAA Federal Savings Bank,</b>	:	
	:	<b>HEARING DATE &amp; TIME:</b>
<b>Movant</b>	:	<b>10/28/2020 at 10:30 a.m.</b>
<b>vs.</b>	:	
	:	
<b>David Fetsko and</b>	:	
<b>Miranda Fetsko,</b>	:	
<b>Respondents</b>	:	
	:	
<b>And</b>	:	
	:	
<b>Ronda J. Winnecour, Esquire,</b>	:	
<b>Trustee,</b>	:	
<b>Additional Respondents</b>	:	

**RESPONSE TO USAA FEDERAL SAVINGS BANK'S MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY**

**AND NOW** come the Debtors, David Fetsko and Miranda Fetsko, by and through their attorney, Paul W. McElrath, Esquire, and the law firm of McElrath Legal Holdings, LLC, and files the within Response to USAA Federal Savings Bank's Motion for Relief From the Automatic Stay, and in support of avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Statement from Movant, No Response Necessary.
5. Denied. Strict proof demanded at time of hearing.

6. Admitted. However the Debtors are not opposed to amending their plan to cure the arrears.
7. Denied. Strict proof demanded at time of hearing.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Denied.
14. Denied.

**WHEREFORE**, the Debtors pray that this Honorable Court:

1. Deny USAA Federal Savings Bank's motion for relief from the automatic stay.
2. Order any other relief that the Court deems just and proper.

Respectfully submitted,

Date: October 7, 2020

/s/ Paul W. McElrath  
Paul W. McElrath, Esquire  
PA I.D. # 86220  
1641 Saw Mill Run Boulevard  
Pittsburgh, PA 15210  
Tel: (412) 765-3606  
Fax: (412) 765-1917  
E-mail: paulm@mcelrathlaw.com  
Attorney for Debtors